

1 John Targowski (Bar No. 226053)
2 **Targowski Law Office**
3 475 Washington Blvd
4 Marina Del Rey, CA 90292
Telephone: (310) 920-9177
Email: jtargo@icloud.com

5 Attorney for Defendant
6 ROBERT AGUIRRE

7 **UNITED STATES DISTRICT COURT**
8
CENTRAL DISTRICT OF CALIFORNIA
9

10 UNITED STATES OF AMERICA

11 Plaintiff,

12 v.

13 MARTINEZ *et. al.*,
14 ROBERT AGUIRRE #4,

15 Defendant.

Case No. 8:22-cr-00034-FWS-4

The Honorable Fred W. Slaughter

**DEFENDANT ROBERT
AGUIRRE'S NOTICE OF JOINDER
IN CO-DEFENDANT ROBERT
MARTINEZ' MOTION TO DISMISS
INDICTMENT (ECF 2063) WITH
PREJUDICE DUE TO
GOVERNMENT'S FAILURE TO
FUND CJA DEFENSE**

16 Date: November 20, 2025

17 Time: 2:30 p.m.

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21 Defendant, ROBERT AGUIRRE, through counsel John Targowski, hereby joins the
22 filing of co-defendant Robert Martinez, motioning this Court to dismiss the indictment against
23 him with prejudice due to the government's failure to fund the CJA defense counsel.
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25 Mr. Aguirre's Joinder is based on the attached declaration of counsel, all files and records
26 in this case, and any further information or arguments that may be presented regarding the
aforementioned motion and this Joinder.
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2 Mr. Aguirre incorporates by reference all arguments contained in the aforementioned
3 motion and accompanying supporting memoranda.

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5 DATED: November 5, 2025

Respectfully submitted,

6 /s/ John Targowski
7 JOHN TARGOWSKI
8 Attorney for Defendant
ROBERT AGUIRRE

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2 DECLARATION OF JOHN TARGOWSKI
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4 I, John Targowski, hereby state and declare as follows:
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1. I am an attorney licensed to practice law in the State of California and a member in good
2 standing of the Bar of this Court. I am a member of the CJA Indigent Defense Panel and
3 have been appointed to represent Robert Aguirre in the case of *United States v. Martinez*
4 *et al.*, No. 8:22-cr-00034-FWS.
5. I submit this declaration in support of the joinder of Robert Aguirre in the motion of his
6 co-defendant, Robert Martinez.
7. Mr. Aguirre is charged in Count 1 (18 U.S.C. § 1962(d) (RICO Conspiracy)), Count 2
8 (21 U.S.C. § 846 (Conspiracy to Possess with Intent to Distribute Controlled
9 Substances)), Count 9 (18 U.S.C. §§ 1959(a)(5), (a)(3), 2(a) (Attempted Murder and
10 Assault with a Dangerous Weapon in Aid of Racketeering)), Count 10 (18 U.S.C. §§
11 924(c)(1)(A)(i), (iii), 2(a) (Possession of a Firearm in Furtherance of a Crime of
12 Violence)), and Count 15 (18 U.S.C. §§ 1959(a)(5), (a)(3), 2(a) (Attempted Murder and
13 Assault with a Dangerous Weapon in Aid of Racketeering)) of the Indictment.
14. Mr. Aguirre has standing to join co-defendant Robert Martinez's motion to dismiss. Mr.
15 Aguirre is Mr. Martinez's co-defendant in the same indictment that was issued by the
16 grand jury that issued his co-defendant's indictment. Mr. Aguirre would be similarly
17 impacted by the constitutional violations facing Mr. Martinez as a result of the
18 government's failure to fund CJA defense counsel. Further, Mr. Aguirre is also impacted
19 by the structural error caused by this lack of funding.
20. Mr. Aguirre seeks identical relief as his co-defendant. As is true with Mr. Martinez, Mr.
21 Aguirre is facing several counts under the same indictment, and as mentioned above, Mr.
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1 Aguirre will confront the same constitutional issues and structural error as a result of the
2 lack of CJA funding. Accordingly, dismissal with prejudice to the counts against Mr.
3 Aguirre would be the proper remedy.

4 I declare under penalty of perjury under the laws of the United States that the foregoing is
5 true and correct.
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7 Executed on October 28, 2025, at Los Angeles, California.
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9 */s/ John Targowski* _____
10 JOHN TARGOWSKI
11 Attorney for Defendant
ROBERT AGUIRRE
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